



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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(NOT FOR SERVICE)

May 6, 2025

VIA ECF

The Honorable Rachel P. Kovner
United States District Court
Eastern District of New York
Brooklyn, NY

Re: Re: *E.C. et. al. v. The Board of Education of the City School District of the City of New York*, 24-cv-08261 (RPK) (JRC)

Dear Judge Kovner,

As Your Honor may recall, this office represents the Defendants in in the above-referenced proceedings.

I write with the consent of the Plaintiffs to ask for a 30-day extension of time to serve the City's Motion to Dismiss. It is the City's first request for such relief. Since Your Honor set the briefing schedule, which requires the serving of the City's motion on May 6, 2026, the City has been working with Plaintiffs' Counsel to narrow the issues in dispute. This office apologizes for the belated request as it is in derogation of Your Honor's Individual Rules. In the interest of settling the matter without Court intervention, I reached out to Plaintiffs previously, but was only able to obtain their consent today.

Plaintiffs consent to this extension until June 6, 2025. In their April 7, 2025 letter, Plaintiffs confirmed receipt of all payments. See ECF #15. However, Plaintiffs indicated they would like time to determine whether all issues are settled.

Respectfully, the City, with the consent of the Plaintiffs request an additional 30 days – until June 6, 2025—to make its motion. As this does affect the other deadlines in the briefing schedule, the City respectfully asks for Plaintiffs response to be served on July 7, 2025 and a reply if any by July 17, 2025

Thank you for your consideration of the above request.

Respectfully submitted,

/S/

Alfred Miller, Jr.
Assistant Corporation Counsel

Cc: All Counsel of Record via Email.